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January 5, 2024

VIA ECF

Honorable Rukhsanah L. Singh, U.S Magistrate Judge
United States District Court – District of New Jersey
Clarkson S. Fisher Building & U.S. Courthouse
402 East State Street, Court Room 7W
Trenton, NJ 08608

Re: In Re: Johnson & Johnson Talcum Powder Product Marketing, Sales Practice and Products Liability Litigation – MDL 2738

This document relates to: Entry 374 on Exhibit A to letter of December 14, 2023
{Docket No. 28797}

Dear Magistrate Judge Singh,

We write on behalf of the below listed plaintiffs with respect to J & J's PPF Deficiency Notice letter filed with the Court:

1. Allen, Teresa. – 3:17-cv-12473 - Plaintiff Theresa Allen inadvertently filed two actions in the above-referenced litigation. One is filed in the MDL, under Case No. 3:17-cv-12473, and the second is filed in the Superior Court of New Jersey Law Division: Atlantic County, under Case No. ATL-L-002341-20. Plaintiff is represented in the second matter by OnderLaw, LLC. Plaintiff's counsel reached out to Defense regarding the duplicate-filed lawsuit and requested that the MDL filed lawsuit, and that action only, be voluntarily dismissed, without prejudice against the defendants, as a duplicative filing. Defense counsel would not agree. Plaintiff's other action, filed in New Jersey Atlantic Superior Court, Case No. ATL-L-002341-20, will remain filed. As such, this dismissal will in no way impede the advancement of Plaintiff's other action. The undersigned hereby requests the Court allow the MDL filed lawsuit to dismiss their case with the dual representation language in order for OnderLaw, LLC to continue their filed action in New Jersey Atlantic Superior Court.
2. Carr, Pamela - 3:17-cv-12400 – This PPF was served on 10/21/2021. Defendant has acknowledged same and agreed to remove this case from their list for the hearing.
3. Weathers, Alice Marie Perry – 3:17-cv-12573- This PPF was served on 11/8/21. Defendant has acknowledged same and agreed to remove this case from their list for the hearing.

4. Ray, Lisa - 3:17-cv-12627-This PPF was served on 10/22/21. Defendant has acknowledged same and agreed to remove this case from their list for the hearing.
5. Dawiec, Synthia – 3:17-cv-12530 - Plaintiff has not submitted the Plaintiff Profile Form. Defendant has agreed to an extension until 1/19/24.
6. Cavolt, Katherine – 3:16-cv-09400 – Plaintiff has not submitted the Plaintiff Profile Form. Defendant has agreed to an extension until 1/19/24.
7. Nava, Amey – 3:17-cv-12427 - This case was dismissed.
8. Smith, Janet – 3:17-cv-12608 - This case was dismissed.
9. Tabarini, Bernard – 3:17-cv-12611 - This case was dismissed.
10. Murray, Melissa - 3:17-cv-12486 – This case was dismissed.

We believe we may need Court intervention on one case, Teresa Allen. We are ready and willing to attend the telephonic conference on January 10, 2024 if need be.

Dated: January 5, 2024

Respectfully submitted,

/s/ Randi Kassan
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Attorneys for Plaintiff Teresa Allen

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on January 5, 2024, a true and correct copy of the foregoing was filed electronically with the Case Management/Electronic Filing System (CM/ECF) for the U.S. District Court for the District of New Jersey. A notice of electronic filing will be served on all parties by operation of the Court's CM/ECF system.

/s/ Randi Kassan
Randi Kassan
Counsel for Plaintiff